

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK**

**UNITED STATES OF AMERICA,
Plaintiff,**

Civil No. 05-CV-355 ()

vs.

**\$2,300,577.10 in United States Currency
from Evergreen Bank Account No.: XXXX0835;**

**\$124,283.08 in United States Currency
from Pioneer Savings Bank Account No.: XXXX2965;**

**\$1,002.70 in United States Currency
from Bank of America Account No.: XXXX2705;**

**\$3,000.00 in United States Currency from Official
Check No.: XX0907, from the Bank of Illinois
Service Federal Savings and Loan Association of Chicago,
located in their internal Daily Investment Deposit Account;**

**\$20,000.00 in United States Currency from Teller's Check
No.: XX7213 from Pioneer Savings Bank, located in their
Official Checks Account;**

**49 Miscellaneous uncashed, Personal, Official, Cashier's
and Treasurer's Checks made payable to Redwood Trust;**

**3 Uncashed Money Orders made payable to Redwood
Trust;**

Defendants.

VERIFIED COMPLAINT FOR FORFEITURE IN REM

The United States of America, by its attorney Glenn T. Suddaby, United States Attorney
for the Northern District of New York, and Thomas A. Capezza, Assistant United States
Attorney, for its verified complaint herein alleges on information and belief as follows:

NATURE OF ACTION

1) This is an in rem civil forfeiture action pursuant to 18 U.S.C. § 981(a)(1)(C), 18 U.S.C. §§ 1956 (c) and 1961(1).

JURISDICTION AND VENUE

2) Jurisdiction and venue are proper pursuant to 28 U.S.C. §§ 1345, 1355, 1395, 18 U.S.C. § 981 and 18 U.S.C. § 881.

DEFENDANTS IN REM.

- 3) The defendants *in rem* are:
- a. \$2,300,577.10 in United States Currency from Evergreen Bank Account No.: XXXX0835;
 - b. \$124,283.08 in United States Currency from Pioneer Savings Bank Account No.: XXXX2965;
 - c. \$1,002.70 in United States Currency from Bank of America Account No.: XXXX2705;
 - d. \$3,000.00 in United States Currency from Official Check No.: XX0907, from the Bank of Illinois Service Federal Savings and Loan Association of Chicago, currently held in the bank's internal Daily Investment Deposit Account;
 - e. \$20,000.00 in United States Currency from Teller's Check No.: XX7213 from Pioneer Savings Bank, located in their Official Checks Account;
 - f. 49 Miscellaneous uncashed, Personal, Official, Cashier's and Treasurer's checks made payable to Redwood Trust; and
 - g. 3 Uncashed Money Orders made payable to Redwood Trust.

FACTS AND BASIS FOR FORFEITURE

4) There is evidence that the defendant bank accounts, checks, uncashed checks and money orders constitute or are derived from proceeds traceable to a violation of 18 U.S.C. § 1341

(Mail Fraud) and §1343 (Fraud by Wire, Radio or Television). The facts supporting this evidentiary determination include, but are not limited to, the following:

The Advanced Fee Scheme

5. From approximately July 2004 through the present, the United States Postal Inspection Service (USPIS), and the Internal Revenue Service, Criminal Investigation (IRS-CI) conducted an investigation of Redwood Trust (Redwood) and Kenneth G. Titus, Sr. (Titus), the pastor of his own church, Gods Saints Christian Church. As described in more detail below, Titus claims to operate a charitable organization that offers to provide “humanitarian aid” to others to pay off mortgages, child support, credit card debt, and even church mortgages. Redwood charges fees for participation in most of these programs. Between September 2003 and December 2004, Redwood has grossed more than \$4.2 million in fees from people interested in receiving the advertised humanitarian aid.

6. The investigation to date reveals that approximately 962 individuals have submitted payments to Redwood using UPS, DHL, Federal Express, and other couriers. According to statements made by Titus in forums other than the web site, the fees for the mortgage program -- \$3,000 for one mortgage and \$2,000 for each additional mortgage -- serves the purpose of holding a place in line for a given person to have his or her mortgage paid off when Redwood receives the necessary funding. Interviews of those persons who paid fees to Redwood reveals that those persons did so because they believed Redwood would pay off their mortgages.

7. Of the original \$4.2 million in gross proceeds received in fees from individuals, approximately \$2.3 million of those funds were transferred to an account at Evergreen Bank in

the name of Redwood and Kenneth G. Titus, Sr, Trustee.

8. During a January 18, 2005 interview with law enforcement personnel, Titus indicated that he planned to use this \$2.3 million to participate in an investment program promising a 100% return every fourteen days. According to the materials Titus provided during the interview, the money was to be wired to a bank account in Livonia, Michigan, before subsequent transfer to Paris, France, or Amsterdam, Netherlands. The instructions in the materials refer to the Bank of the Pacific/ABN AMRO and a document attached to those instructions lists an address in Guam. A web site for the Bank of the Pacific lists no branch located in Guam.

Background Regarding Redwood Trust

9. Redwood, which is not known to be a legally operating trust of any kind, has been in existence since August 2000 and commenced operations in September 2003. Redwood has established a Federal Employer Identification Number and has numerous bank accounts used to conduct its operations. Redwood promotes its programs in two ways: through a web site and by using “independent representatives” who recruit others.

Redwood’s Web Site

10. Redwood’s web site was available to individuals until approximately the end of February 2005. The web site has since “gone dark” and is no longer available on the web. The following is a summary based on a review of the Redwood web site on January 11, 2005. The humanitarian charter is defined as “helping American families by relieving their financial burdens.” Redwood defines itself as “a group of agents organized together to help Americans with humanitarian aid in many forms. This aid, usually in the form of charter, is given to adults

and families as a way to make a huge difference within their lives. Focusing first on homes, these charter and aids are provided for those who need help. Primarily starting with foreclosures but also allowing for distressed and near foreclosure homes.” The links for foreclosure and mortgage charter provide: “What happens is we obtain a charter for you and simply pay off your foreclosure. Nothing fancy like buying your house from underneath you or renting your home back to you. We simply pay it off. No title change, no refinancing or land sales contracts. Your mortgage company simply gets paid in full. Your contract is satisfied and a positive report is entered on your credit report. You receive the deed from the mortgage company. No more house payments.” After stating the fees, the same page indicates, “We make no promise to pay off your foreclosure. If you have paid any fees to Redwood Trust, we will refund them to you at any time by request. Remember folks, this product is pending and has not begun yet. This has never been done before. We will make our best effort to settle your foreclosure before you go to auction.” In addition to this language, each page of the web site contains the following disclaimers: “Disclaimer: Information on this web site represents how the web master understands this process. Details and verbiage may be changed from time to time. Do not consider these pages to be accurate until these programs actually begin. For complete details, please contact Redwood Trust directly.” At the bottom of the page after a copyright sign the statement “This product is pending and has not begun yet” appears.

11. A page titled, “How does this work?” states, “It works like this. Redwood Trust has direct access to humanitarian funds for many programs.”

12. A page titled, “Too good to be true?” states, “Many would say so. After all, we’ve all heard the axiom ‘if it sounds too good to be true, it probably is!’ However, there is a

reason the word ‘probably’ was put there. If it were always true, then what would that statement say about our fellow man? As we stated before, this is a Christian Trust Fund simply created to help our fellow American’s [sic]. Believe it or not, there are people in this country who feel that we should help each other. Like the popular movie a few years ago, we like to ‘Pay it forward’. We invite your skepticism and your probing questions. If you would like more information about this process, please contact us by telephone or email us.”

13. The main page of the web site also referenced a warning from the Oregon Division of Finance and Corporate Securities regarding Redwood Trust, but claims that Oregon has no evidence supporting its allegations.

14. The web site also provided a link to forms requiring applicants to provide information for participation in the mortgage charter program including names, addresses, social security numbers, and detailed mortgage information. The instructions indicate that the form should be completed on line then saved, signed and notarized before being sent to Redwood. The instructions state that the forms should be sent “by FedEx, Airborne or UPS. Any documents remitted through the United States Postal Service will be returned to sender.”

15. Redwood did not charge a fee for people in foreclosure. These people are allowed into the program/charter for no application fee. People in foreclosure have been encouraged by Redwood to seek legal advice. Some have been directed to a couple in Arizona who specialize in foreclosure stalling tactics.

Investment Representatives

18. Redwoods also uses “Independent Representatives (IRs)” to advertise its programs. The IR’s sign up on the web site. There are approximately 7,000 IR’s who expect to be paid a percentage of the fees paid by individuals they recruit. There is more than one tier of IR offering different levels of compensation.

Conference Calls

19. Redwood hosts regular conference calls for its clients and IR’s, which Titus leads. During the calls Titus discusses the current operations at Redwood and provides information about what is expected. There is also a question and answer period. During those conference calls, Titus has stated that no funding has yet arrived, but promises that it is forth coming. He often provides a date in the near future, and when that date arrives explains that there were funding problems. The date that the mortgages will actually be paid off is then pushed back further in the future. Dates that have been mentioned were mid September 2004, mid November 2004, mid December 2004, and mid January 2005. Most recently, Titus has given dates of mid February or mid March 2005.

Fees and Redwoods Refund Policy

19. When fees are received from individuals they were deposited at Pioneer Savings Bank checking account no. : XXXX2965. This account acts as Redwood’s main operating account. Funds in this account were then moved to other accounts that act as a payroll account, four investment accounts, two business expense accounts, and two church related accounts.

Redwood offers a refund policy for those who request refunds. From September 2003 through December 4, 2004, Redwood refunded nearly \$386,000. This is about 15% of total

funds received by Redwood. A member of Redwood's staff present during an interview of Titus on January 18, 2005, thought the total refunds given out was about 10% of total clients. In forums other than the internet site, such as conference calls, Titus has warned clients that they will lose their place in line when the refund check is cut.

20. A person who is not a Redwood employee prepares summaries of these conference calls and the summaries are then e-mailed to the Redwood office. According to a Redwood staff member, the e-mails were reviewed, and if close to the actual events, they were sent out to IR's and individuals who had requested the information.

Statement Given by Titus

21. On or about January 13, 2005, Titus left a voice mail message for the USPIS investigator investigating Redwood and indicated that he was aware that he was under investigation and that he would like to meet with the investigator.

23. On or about on January 18, 2005, an IRS-CI investigator and a USPIS investigator interviewed Titus at his business located at 901 Draper Avenue, Suite 221 in Schenectady, New York. Although Titus was not in custody at the time, he was nevertheless advised of his rights pursuant to United States v. Miranda which he waived orally. During the interview Titus indicated that he was planning to transfer approximately \$2 million of the fees received by Redwood from clients in order to participate in a program promising 100% return on his investment every few weeks. More specifically, Titus stated that he received documents from a third party stating that a group of people, unknown to him, have investments and want the proceeds to go to good causes. Titus further stated to the investigators that if he (Titus) opens a joint account with two men he has never met and deposits the approximately \$2 million dollars,

then they will allow Redwood to take \$20 million a week. Titus gave investigators documents that promise that the initial \$2 million investment will return a 100% profit “every 14 banking days or less.” The paperwork refers to the Bank of the Pacific as a partner with ABN AMRO Bank and provides a Guam address. On January 18, 2005, the ABN AMRO customer service representative stated no affiliates with that name. In addition, on January 18, 2005, an internet search engine query for the Bank of the Pacific yielded one in Washington State, but it had no branch location in Guam. According to the paperwork, the information provided is “for use only for wiring funds in order to open individual/corporate bank accounts with Bank of the Pacific/ABN AMRO, initially in Livonia, Michigan for further transfer off shore to ABN AMRO Paris, France OR AMSTERDAM NETHERLANDS.” (Capitalization in original).

27. In response to questions about Redwood’s “direct access to humanitarian funds for many programs,” Titus initially told investigators that the humanitarian groups were confidential, but he later mentioned to investigators the \$2 million investment opportunity described above as well as the following two sources:

A. Switzerland – These funds are the proceeds of Mexican gold sales that had the funds tied up and someone unknown to Titus was working on getting them freed up. When this was complete, the individual would give \$1.4 billion to Redwood. He was introduced to this funding potential at a seminar in Detroit. That person put him in contact with a host of others who Titus has never met. Titus has no paperwork on this aspect. He also claims that the administration and George H. W. Bush, personally, tied up these funds in both Japan and now Switzerland.

B. California – A woman Titus has not met is interested in giving gold mine claims in the U.S. and abroad to organizations that help people. She claims to have 50 gold mine claims; each valued at \$1 trillion dollars. Titus expects to get at least one claim. During the interview, Titus relied on the disclaimers on the web site and his belief that funding will become available to pay off the mortgages of his clients. He also claimed that he did not write the e-mails summarizing the telephone conferences and claimed that he did not review most of them. Titus stated that he is not a paid staff member. He is a volunteer and his only form of compensation is a car paid for by Redwood and the payments of his personal medical expenses (which includes treatment for a serious medical condition).

Analysis of Bank Accounts

28. Pioneer Savings Bank Account No. XXXX2965 (Main Operating Account)

This Redwood account was opened in the name of Redwood Trust and Kenneth Titus, Trustee. Kenneth Titus is the only signatory on the account other than “Redwood Trust.” Approximately \$2,591,157.64 was deposited in this account between September 2003 and December 2004. These deposits appear to be application fees from clients of Redwood. The deposit items were cashier’s checks and official bank checks in amounts from \$1,000 to \$10,000. Some individuals were on payment plans spanning 12 to 36 months. The deposits were generally made in large batches. At some time, Titus endorsed the checks with his signature, but at some later point the endorsements were made with a “Redwood Trust” stamp. Several checks had the remitter’s name on them and according to statements made to the USPIS investigator who interviewed some of the individuals who wrote checks, they believed their mortgages would be paid in full. The funds in **Pioneer Savings Bank Account No. XXXX2965** were used to pay for utilities,

office supplies, fixed assets, rent, license fees, travel, meals and other ordinary business expenses. Funds from this account were also removed by cashing checks at the bank. This was infrequent, but happened on a few occasions. An analysis shows that from September 2003 to December 2004, Redwood paid out at least \$358,000.00 in these expenses and in payroll. Periodically, large withdrawals in the form of checks would be written against this account, which would then be deposited in another Redwood account located at the Hudson River Bank and Trust. The Hudson River Bank account No. :XXXX6024 was used to write payroll checks and had direct deposits withdrawn. This was the main account into which all of the mail fraud and wire fraud proceeds were deposited. Funds from the Hudson River Bank and Trust account No. : XXXX6024, were then moved into other accounts held by Redwood and a Titus.

29. **First Niagara Account (formerly Hudson River Bank and Trust)**
Account No. XXXX6024: (Payroll Account)

An analysis of bank records shows this account to be the payroll account for Redwood Trust. There are infrequent deposits in large amounts that are checks from Redwood's operating account being deposited to fund the account. A review of the deposit items shows Pioneer Saving Bank checks being deposited. The expenses all appear to be payroll checks to employees, payroll taxes to various Federal and state agencies, and related unemployment taxes to various Federal and state authorities. Titus stated to investigators that Hudson River Bank and Trust was used as a payroll account, but also added that Redwood uses a payroll service. The funds in this account from the operating account are proceeds of mail fraud and wire fraud.

30. **Redwood Trust – Bank of Richmondville:** Based upon bank records and interviews, on September 13, 2004, Titus opened an account and purchased a one year certificate

of deposit (CD) for \$450,000.00. The Bank of Richmondville was presented with a Pioneer Savings Bank Teller's Check drawn against funds in Pioneer Savings Bank account no.: 2965 and made payable to The Bank of Richmondville for \$450,000. This CD was subsequently used as collateral for a \$440,000 loan on September 16, 2004 to an acquaintance of Titus. Both the CD and the loan mature in one year.

31. **American Check and Judgement – Bank of America (formerly Fleet Bank)**
AccountNo. XXXX2705:

This is a debit card account which records show was used for both personal and business use. Titus told investigators this account was used to pay his travel expenses, car repairs for Redwood, his personal medical expenses, and other expenses he deemed necessary to operate Redwood. Bank records of this account show deposits in the form of checks drawn against the the main operating account (Pioneer Savings Bank Account 2965), personal checks and also large amounts of cash were deposited. From January 2004 though December 2004, the following deposits were made into this account:

- A. \$40,860 in U.S. currency;
- B. \$25,000 in checks from Redwood's operating account; and
- C. A \$210 check.

32. **Evergreen Bank, a Division of Banknorth, N.A. Account No. XXXX0835:**

This Redwood account was opened November 23, 2004. Bank records show that the following Pioneer Savings Bank Teller's Checks were drawn against the main operating account, Pioneer Savings Bank Account #: XXXX2965, which contained client fees, were deposited into this **Evergreen Bank, a Division of Banknorth, N.A. Account No. XXXX0835:**

- A. Between November 23, 2004 and December 15, 2004 teller's checks in the amounts of \$490,000.00, \$500,000.00 and \$10,000.00;
- B. An additional \$1,000,000.00 in deposits was made in December 2004.

This account appears to be the main "holding" account for Pioneer Savings Bank funds.

33. **Redwood Trust Pioneer Savings Bank Account No. : XXXX2965:** On or about January 20, 2005, IRS-CI and USPIS investigators interviewed employees of Redwood Trust. Documents presented to investigators at that time by the employees showed that the **Pioneer Savings Bank Account No. : XXXX2965** contained \$965,617.42 as of January 11, 2005. Employees told investigators that the funds in this account come from two sources: 1) the mortgage charter program described above and 2) the "Blessings Program."

Redwood Trust - The Blessings Program

33. Employees told investigators that in or about January 2005, Redwood began a "Blessings Program." Based on an informational package about the "Blessings Program and information provided by employees, this program allowed people to make investments of \$25,000 with a guaranteed rate of return of 20% per week for 40 to 50 weeks. The written materials promised a weekly return of \$5,000 for each \$25,000 investment. The program is promoted during the conference calls described above. According to bank records, the **Pioneer Savings Bank Account No. : XXXX2965** had received the following deposits from individuals participating in "Blessings Program," which total \$224,990.00:

- A. Three \$25,000.00 checks;
- B. One \$24,990.00 check;
- C. A \$100,000.00 wire; and,

D. A \$25,000.00 wire.

The employees of Redwood further stated that all payments are received by United States Postal Service or a common carrier such as Federal Express.

35. On or about January 18, 2005, Titus told investigators that all the income for Redwood Trust comes from individuals or entities paying to participate in the offered programs including the mortgage charter and the blessing program. Titus explained to investigators that the "Blessings Program" is a high yield program, but that it does not pay interest. Titus also told investigators that he had recently decided to begin accepting payments sent by the United States Mail. The mortgage charter program and the blessing program had all their deposits go into **Pioneer Savings Bank Account No. : XXXX2965.**

Funds from \$3,000.00 Official Check No. : XX0907
from the Bank of Illinois Service Federal Savings and Loan
Association of Chicago, located in their internal
Daily Investment Deposit Account;

36. On or about February 11, 2005, a IRS-CI investigator visited the Redwood offices. At that time, an employee showed the investigator an Official Check No. : XX0907, from the Bank of Illinois Service Federal Savings and Loan Association of Chicago, dated 1/16/04, payable to Redwood Trust in the amount of \$3,000.00 and remitted by investor Jane Doe 1. An employee told the investigator that Jane Doe 1 had requested a refund and did receive such refund. An examination of subpoenaed bank records confirms that Jane Doe 1 had deposited the Redwood Trust refund check into her bank account and the check had cleared.

Verification that the Redwood Trust refund check was deposited by Jane Doe 1, confirms that Jane Doe 1 was made whole by Redwood Trust. Therefore, the \$3,000.00 cashier's check should not be returned to the Jane Doe 1, nor should the cashier's check be allowed to lapse because taking either of these actions, would mean that Jane Doe 1 would be inadvertently profiting from the alleged scheme. The government seeks to arrest the \$3,000.00 Official Check No. : XX0907, from the internal Daily Investment Deposit Account of the Bank of Illinois Service Federal Savings and Loan Association of Chicago. The funds will then be deposited in a Treasury Suspense account until this matter is resolved, with a view to restoring other investors/victims who currently have a net loss.

\$20,000.00 in United States Currency from Teller's Check
No.: XX7213 from Pioneer Savings Bank, located in their
Official Checks Account;

37. On or about February 11, 2005, an IRS-CI investigator visited the offices of Redwood Trust and learned from an employee that the business operator, Kenneth Titus, had recently discovered a **\$20,000.00 Teller's Check No. : XX7213**, from the Pioneer Savings Bank, dated 3/16/04, payable to God's Saint's Christian Church, in the amount of \$20,000.00. The check is drawn against funds previously held at Pioneer Savings Bank, account number ending in 2965 in the name of Redwood Trust and Kenneth G. Titus, Sr. Trustee. The check is made payable to an entity controlled by Kenneth Titus called "Gods Saints Christian Church". According to bank records, this entity has two bank accounts at Charter One Bank. The \$20,000.00 Teller's Check is drawn on Redwood Trust's main operating account at Pioneer

Savings Bank (account ending in 2965). The Pioneer Savings Bank account ending in 2965, is the primary account where Titus deposited the fees remitted to Redwood Trust and used to advance the scheme and enrich himself. This account, over approximately 18 months, had deposits in excess of \$4 million, of which almost all were monies obtained through the mail fraud and wire fraud schemes mentioned above. Evidence to date reveals that the \$20,000.00 cashier's check is money from the scheme proceeds. The government seeks to arrest the **\$20,000.00 Pioneer Saving Bank's Teller's Check No. : XX7213** for deposit in a Treasury Suspense account until this matter is resolved with a view to restoring other investors/victims who currently have a net loss.

Uncashed Checks and Money Orders

38. Between February 14, 2005 and February 25, 2005 employees of the Redwood Trust turned over to an IRS-CI investigator forty-nine (49) miscellaneous uncashed Personal, Official, Cashier's and Treasurer's Checks, from individuals, ranging in amount from \$1,000.00 to \$5,000.00. All are made payable to Redwood Trust. These uncashed checks total approximately \$149,000.00. The government seeks to arrest these forty-nine uncashed checks as proceeds of a fraud and shall maintain the checks in their uncashed form.

39. Additionally, on or about February 25, 2005, employees of the Redwood Trust turned over to an IRS-CI investigator three (3) Money Orders, from independent representatives of the Redwood Trust. The Money Orders range in amount from \$26.00 to \$280.00 all made payable to Redwood Trust. These money orders represent the fees paid to Redwood Trust by IR's. These uncashed money orders checks total \$446.00. The government seeks to arrest the three (3) uncashed money orders and shall maintain the money orders in their uncashed form.

Potential Claimants

*Redwood Trust
901 Draper Avenue
Suite 221
Schenectady, New York 12306*

*Kenneth G. Titus, Sr.
329 Glen Avenue
Scotia, New York 12302*

Financial Summary

40. The investigation has thus far revealed that approximately 954 individuals sent money to Redwood Trust to have their mortgages paid off; 8 additional individuals invested in the Redwood Blessings Program. Redwood received a total of approximately \$4,241,318.79 via UPS, DHL, Federal Express, and other couriers. Of the \$4.2 million received, approximately 2% (\$93,242.20) was used to pay off one mortgage and the arrears for three others; approximately 12% (\$502,185.00) was refunded to investors. The remainder, more than \$3.6 million, was used either for the benefit of Redwood or Titus, or is being held in an account in the interest of Redwood or Titus.

Conclusion

41. Based on the foregoing, there is reason to believe that the above-referenced defendants-in-rem constitute proceeds traceable to a violation of Title 18, United States Code, Section 1341 (Mail Fraud) and Title 18, United States Code, Section 1343 (Wire Fraud) and are forfeitable to the United States of America pursuant to Title 18, United States Code, Section 981(a)(1)(C), Title 18, United States Code, Sections 1956(c)(7) and 1961(1).

RELIEF

WHEREFORE, Plaintiff, the United States of America, respectfully requests that a warrant for arrest of the Defendant Funds be issued; that due notice be given to all interested parties to appear and show cause why the forfeiture should not be decreed; that judgment be entered declaring the Defendant Funds be condemned and forfeited to the United States of America for disposition according to law; and that the United States of America be granted such other further relief as this Court may deem just and proper, together with the costs and disbursements of this action.

Respectfully submitted,

Glenn T. Suddaby
United States Attorney

Date: March 21, 2005

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VERIFICATION

STATE OF NEW YORK }

} SS:

COUNTY OF ALBANY }

ZACHARY RYAN, being duly sworn, deposes and says:

I am a special agent with the Internal Revenue Service, Criminal Investigation (IRS-CI), and the facts as alleged in the Verified Complaint for Forfeiture are true to the best of my knowledge and belief based upon information based upon knowledge possessed by me and/or on information received from other law enforcement agents.

Date: March 21, 2005

Zachary Ryan
Special Agent
U.S. Internal Revenue Service
Criminal Investigation

Sworn to before me this
day of 2005

Notary Public